

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

United States, et al.

Plaintiffs,

vs.

Google LLC

Defendant.

Civil Action No. 1:23-cv-00108-LMB-JFA

**[PROPOSED] ORDER GRANTING THE PARTIES' MOTIONS TO SEAL  
(DOCKET NOS. 605, 642, 651, 661, 667, 712, AND 738)**

Pursuant to Local Civil Rule 5(C), the Parties in this action filed motions to seal, seeking leave to file certain sealed and redacted versions of memoranda submitted to the Court and exhibits thereto. Microsoft Corporation and Xandr Inc. (together, “Microsoft”) duly filed a Memorandum in Support of the Parties’ Motions to Seal (the “Microsoft Memorandum”) as required by Local Civil Rule 5(C).

Upon consideration of the Motions, supporting papers, and the Microsoft Memorandum, the Court finds that (i) the exhibits and redacted text contain Microsoft’s confidential business information; (ii) only sealing will sufficiently protect Microsoft from competitive harm and no less drastic alternatives will suffice; (iii) the limited sealing and redaction properly balances Microsoft’s interests against the public’s interest; and (iv) the public’s right of access, whether based on the common law right of access, or the First Amendment right of access, has been overcome. Accordingly, for good cause shown, it is hereby:

ORDERED that Defendant Google LLC’s Motions to Seal (ECF Nos. 605, 651, and 712) and Plaintiffs’ Motions to Seal (ECF Nos. 642, 661, 667, and 738) are GRANTED as to

Microsoft's highly confidential information as outlined in Appendix A to the Microsoft Memorandum and as exhibited to the Declaration of Eileen M. Cole in Support of the Microsoft Memorandum. The exhibits and redacted text shall remain under seal until further order of the Court.

ENTERED this \_\_\_\_ day of \_\_\_\_\_, 2024.

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